

# EXHIBIT 11

**Robbins Geller  
Rudman & Dowd LLP**

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August 31, 2023

VIA EMAIL

Robert Kingsley Smith  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109

Re: *In re Pegasystems Inc. Securities Litigation*,  
No. 1:22-cv-11220-WGY (D. Mass.)

Dear Counsel:

Plaintiffs received a document production from Deloitte & Touche LLP (“Deloitte”) on August 28, 2023. A number of the documents in that production bear redactions, some of which are labeled as “Attorney Work Product,” while other redactions are represented simply as black boxes. We understand that Pegasystems intended to review Deloitte’s documents for work product, apply redactions, and/or request that Deloitte withhold documents from production to Plaintiffs, and prepare a privilege log identifying the redacted and withheld documents. However, a privilege log corresponding to Deloitte’s production has not been provided to Plaintiffs. Additionally, given the lack of a privilege log, it is unclear whether any documents were withheld at Pegasystems’ request.

To the extent any of Deloitte’s documents have been redacted or withheld by Pegasystems (or at Pegasystems’ request), please provide a privilege log of those documents by September 8, 2023.<sup>1</sup>

To the extent a privilege log corresponding to Deloitte’s documents (and/or Pegasystems’ documents) was prepared or provided to the SEC, in connection with the SEC’s request for

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<sup>1</sup> The drafts of the ESI protocol that Plaintiffs proposed to Defendants on June 29 and July 31, 2023 set forth the fields of information that Plaintiffs believe should be included in the privilege log. For the avoidance of confusion, nothing in this letter shall constitute or be construed as a waiver of any rights that Plaintiffs may have with respect to the issues addressed herein, and Plaintiffs reserve all rights to challenge Defendants’ or Deloitte’s assertions of work product or other protections over documents and information requested from Deloitte or Defendants.

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information as disclosed in Pegasystems' Form 10-Q, filed on April 26, 2023, please provide that privilege log(s) by September 8, 2023 as well.

Finally, please confirm by September 8, 2023 that the same assertions of privilege, work product, or other protections made by Pegasystems (or at Pegasystems' request) to documents in this case, are also made to the SEC. For example, to the extent documents are produced to both Plaintiffs and the SEC, that Plaintiffs' copies and the SEC's copies bear identical redactions. Also, for example, to the extent documents are withheld from Plaintiffs on the basis of privilege, work product, or other protection, that those same documents were also withheld from the SEC. For the avoidance of confusion, our inquiry concerns both Pegasystems' documents and Deloitte's documents.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris Stewart", with a long horizontal flourish extending to the right.

CHRISTOPHER D. STEWART

CDS:jk